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March 27, 2016

CHRISTOPHER M. MARSTON, TREASURER CONSERVATIVE, AUTHENTIC, RESPONSIVE LEADERSHIP FOR YOU AND FOR AMERICA P.O. BOX 26141 ALEXANDRIA, VA 22313

Response Due Date 05/02/2016

**IDENTIFICATION NUMBER: C00573154** 

REFERENCE: YEAR-END REPORT (07/01/2015 - 12/31/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 4 item(s):

1. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer name and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding

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the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Consulting", "Consultant Expenses", "Consultant Expense Reimbursement", "Event Expense", and "Voter Contact." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement Federal Register published in the be found can http://www.fec.gov/law/policy/purposeofdisbursement/inadequate purpose list 3507.pdf.

**3.** On Schedule B supporting Line 21(b), you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(3))

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- 4. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))
- Schedule B of your report discloses an expenditure(s) for "Communications Consulting", "Media Consulting", "Media Placement", "Online Advertising", "Postage", "Printing", "Printing and Postage", "Telephone Town Hall", "Video Production", "Video Production Expense", and "Video Services." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than

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just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

Sincerely,

Christopher Morse

Senior Campaign Finance Analyst

Reports Analysis Division

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### Inadequate Employer/Occupation Entries Conservative, Authentic, Responsive Leadership For You And For America (C00573154)

Employer	Occupation
2818513300	2818513300
ALMOSTEUROPE LMII	SELF EMPLOYED
BAPTIST MEDICAL CENTER	INFORMATION REQUESTED PER BEST
	EFFORTS
BEAM OF LIGHT TECHNOLOGIES, INC.	SELF EMPLOYED
BULLINGTON INS AGENCY INC	SELF EMPLOYED
D #38	MATH TEACHER
DCS	LEADER
DPS TECK LLC	SELF EMPLOYED
E J HOLTZE CORP	SELF
GPG CONSULTING	SELF EMPLOYED
GTN	SELF EMPLOYED
I AM THE OWNER	CLEANING AND RESTORATION
INFORMATION REQUESTED PER BEST	BUILDER
EFFORTS	
INFORMATION REQUESTED PER BEST	D.H. WRECKING CO
EFFORTS	
INFORMATION REQUESTED PER BEST	ENGINEER
EFFORTS	
INFORMATION REQUESTED PER BEST	EXECUTIVE
EFFORTS	
INFORMATION REQUESTED PER BEST	INFORMATION REQUESTED PER BEST
EFFORTS	EFFORTS
INFORMATION REQUESTED PER BEST	INVESTMENTS
EFFORTS	
INFORMATION REQUESTED PER BEST	INVESTOR
EFFORTS	
INFORMATION REQUESTED PER BEST	PETROLEUM GEOLOGIST
EFFORTS	
INFORMATION REQUESTED PER BEST	PHYSICIAN
EFFORTS	
INFORMATION REQUESTED PER BEST	REAL ESTATE
EFFORTS	
INFORMATION REQUESTED PER BEST	SELF
EFFORTS	
INFORMATION REQUESTED PER BEST	SELF EMPLOYED
EFFORTS	
INFORMATION REQUESTED PER BEST	SELF- EMPLOYEED
EFFORTS	

### Inadequate Employer/Occupation Entries Conservative, Authentic, Responsive Leadership For You And For America (C00573154)

Employer	Occupation
INFORMATION REQUESTED PER BEST	SMALL BUSINESS EXECUTIVE
EFFORTS	SIMILED BOSH (LISS EXECUTIVE
INWESCO, INCORPORATED	SELF EMPLOYED
J&P CUSTOM PLATING, INC	SELF EMPLOYED
JENNINGS MANAGEMENT CONSULTING,	SELF EMPLOYED
LINDA BEAN'S MAINE LOBSTER	INFORMATION REQUESTED PER BEST
	EFFORTS
MCMILLAN ELECTRIC COMPANY	SELF EMPLOYED
ME	BUSINESS OWNER
ME	SELF EMPLOYED
MFD	FOOD SERVICE
MPG	PSYCHOLOGIST
N/A	N/A
N/A	NOT APPLICABLE
NA	NA
NONE	BUSINESS OWNER
NOT NEEDED	NOT NEEDED
R & S OIL COMPANY	ENERGY
R. G M C	REAL ESTATE
RRC	ENGINEER
SCLLC	CONSULTANT
SELF	BUSINESS
SELF	BUSINESS OWNER
SELF	BUSINESSMAN
SELF	CFP
SELF	COMPUTER
SELF	EXECUTIVE
SELF	HEALTH CARE
SELF	INFORMATION REQUESTED PER BEST
	EFFORTS
SELF	MANAGEMENT
SELF	OWNER
SELF	RESTAURANT OWNER
SELF	SELF
SELF	SELF-EMPLOYED
SELF	SMALL BUSINESS MANAGER
SELF	TRANSPORTATION
SELF EMPLOYED	BUSINESS OWNER
SELF EMPLOYED	EXECUTIVE
SELF EMPLOYEED	SMALL BUSINESS OWNER
SELF-EMP	SELF-EMP

### Inadequate Employer/Occupation Entries Conservative, Authentic, Responsive Leadership For You And For America (C00573154)

Employer	Occupation
SELF-EMPLOYED	SELF=EMPLOYED
SI	MANAGER
TAPE PRODUCTS COMPANY	SELF-EMPLOYED
THE	SELF EMPLOYED
THE DIAMOND DISTRICT	SELF EMPLOYED

Late 48 Hour Report (Schedule E) Conservative, Authentic, Responsive Leadership For You and For America (C00573154)

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	AR - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	AR - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	AR - P2016	12/5/15
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	AR - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	AR - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	AR - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	AR - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	AR - P2016	12/5/15
			<u>.</u>		
SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	GA - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	GA - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	GA - P2016	12/5/15
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	GA - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	GA - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	GA - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	GA - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	GA - P2016	12/5/15
SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	MA - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	MA - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	MA - P2016	12/5/15
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	MA - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	MA - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	MA - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	MA - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	MA - P2016	12/5/15
			<u>.</u>		
SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	MN - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	MN - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	MN - P2016	12/5/15
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	MN - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	MN - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	MN - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	MN - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	MN - P2016	12/5/15

Late 48 Hour Report (Schedule E) Conservative, Authentic, Responsive Leadership For You and For America (C00573154)

SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	NH - P2016	12/5/15
SWIFTKURRENT	7/9/2015	\$3,687.81	Carly Fiorina	NH - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	NH - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	NH - P2016	12/5/15
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	NH - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	NH - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	NH - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	NH - P2016	12/5/15
WBIN	11/19/2015	\$7,000.00	Carly Fiorina	NH - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	NH - P2016	12/5/15
SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	NV - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	NV - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	NV - P2016	12/5/15
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	NV - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	NV - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	NV - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	NV - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	NV - P2016	12/5/15
SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	SC - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	SC - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	SC - P2016	12/5/15
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	SC - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	SC - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	SC - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	SC - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	SC - P2016	12/5/15
SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	VA - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	VA - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	VA - P2016	12/5/15
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	VA - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	VA - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	VA - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	VA - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	VA - P2016	12/5/15

### Late 48 Hour Report (Schedule E) Conservative, Authentic, Responsive Leadership For You and For America (C00573154)

SWIFTKURRENT	7/1/2015	\$851.75	Carly Fiorina	VT - P2016	12/5/15
SWIFTKURRENT	8/1/2015	\$447.84	Carly Fiorina	VT - P2016	12/5/15
SWIFTKURRENT	9/1/2015	\$1,385.45	Carly Fiorina	VT - P2016	
SWIFTKURRENT	10/1/2015	\$515.79	Carly Fiorina	VT - P2016	12/5/15
SWIFTKURRENT	11/1/2015	\$289.34	Carly Fiorina	VT - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,340.62	Carly Fiorina	VT - P2016	12/5/15
RIGHT STRATEGIES LLC	11/18/2015	\$1,500.00	Carly Fiorina	VT - P2016	12/5/15
RIGHT STRATEGIES LLC	12/1/2015	\$3,762.94	Carly Fiorina	VT - P2016	12/5/15